

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JCC

**STIPULATION AND (PROPOSED)
ORDER ADDING COVERED ENTITIES
TO STIPULATED SUPPLEMENTAL
PROTECTIVE ORDER (DKT. 135)**

**NOTE ON MOTION CALENDAR:
NOVEMBER 8, 2023**

WHEREAS, the protections set forth in the Stipulated Protective Order (“Protective Order”) in the above-captioned case (“Litigation”), *see* Dkt. No. 95, apply and are available to non-parties as well as parties;

WHEREAS, Plaintiffs and Defendants (together, the “Parties”) have served subpoenas on non-parties Activision Blizzard, Inc. (“Activision”) and Proletariat Inc. (“Proletariat”) that seek certain documents and information relating to Plaintiffs’ claims and Defendant’s defenses;

WHEREAS, on September 25, 2023, the Parties entered a Stipulated Supplemental Protective Order that granted additional protections to non-parties Electronic Arts, Inc., Nintendo of America Inc., and Ubisoft, Inc. (collectively, the “Requesting Companies”), prior to the Requesting Companies disclosing their confidential information in this matter, *see* Dkt. No. 134 (“Supplemental Protective Order”);

WHEREAS, the Court entered the Supplemental Protective Order on September 26, 2023, *see* Dkt. No. 135; and

WHEREAS, prior to the disclosure of their confidential information in this matter, Activision and Proletariat have requested the protections set forth in the Supplemental Protective Order.

WHEREFORE, IT IS HEREBY ORDERED that the provisions in the Supplemental Protective Order apply in full and with equal force to Activision and Proletariat.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 8th day of November, 2023.

s/ David LeRay

Alicia Cobb, WSBA #48685
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1109 First Avenue, Suite 210
Seattle, Washington 98101
Telephone (206) 905-7000
Fax (206) 905-7100
aliciacobb@quinnemanuel.com

Stephanie L. Jensen, WSBA #42042
WILSON SONSINI GOODRICH &
ROSATI P.C.
701 Fifth Avenue, Suite 5100
Seattle, WA 98104-7036
Telephone (206) 883-2500
Fax (206) 883-2699
sjensen@wsgr.com

Steig D. Olson (*pro hac vice*)
David LeRay (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Kenneth R. O’Rourke (*pro hac vice*)
Allison B. Smith (*pro hac vice*)
WILSON SONSINI GOODRICH &
ROSATI, P.C.

51 Madison Avenue
New York, New York 10010
Telephone (212) 849-7231
Fax (212) 849-7100
steigolson@quinnemanuel.com

Adam Wolfson (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Telephone (213) 443-3285
Fax (213) 443-3100
adamwolfson@quinnemanuel.com

Charles Stevens (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California St., 22nd Floor
San Francisco, CA 94111
Telephone (415) 875-6600
Fax (415) 875-6700
charliestevens@quinnemanuel.com

Interim Co-Lead Counsel

David Golden (*pro hac vice*)
CONSTANTINE CANNON LLP
1001 Pennsylvania Ave., 22nd Floor
Washington, D.C. 20004
Telephone (202) 204-4527
Fax (202) 204-3501
dgolden@constantinecannon.com

A. Owen Glist (*pro hac vice*)
Ankur Kapoor (*pro hac vice*)
Jeffrey I. Shinder (*pro hac vice*)
CONSTANTINE CANNON LLP
335 Madison Avenue, 9th Floor
New York, NY 10017
Telephone (212) 350-2700
Fax (212) 350-2701
oglist@constantinecannon.com

1700 K Street, NW, Suite 500
Washington, DC 20006
Telephone (202) 973-8800
Fax (202) 973-8899
korourke@wsgr.com
allison.smith@wsgr.com

W. Joseph Bruckner (*pro hac vice*)
Joseph C. Bourne (*pro hac vice*)
LOCKRIDGE GRINDAL NAUEN
P.L.L.P.
100 Washington Avenue S, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Fax: (612) 339-0981
wjbruckner@locklaw.com
jcbourne@locklaw.com

Interim Co-Lead Counsel

s/ Eric A. Lindberg
Gavin W. Skok, WSBA #29766
FOX ROTHSCHILD LLP
1001 Fourth Avenue, Suite 4400
Seattle, WA 98154
Telephone: (206) 624-3600
Fax: (206) 389-1708
gskok@foxrothschild.com

Kristen Ward Broz
FOX ROTHSCHILD LLP
2020 K. St. NW, Ste. 500
Washington, DC 20006
Telephone (202) 794-1220
Fax (202) 461-3102
kbroz@foxrothschild.com

Charles B. Casper (*pro hac vice*)

Interim Co-Lead Counsel

Kenneth J. Rubin (*pro hac vice*)
 Timothy B. McGranor (*pro hac vice*)
 Kara M. Mundy (*pro hac vice*)
 VORYS, SATER, SEYMOUR AND
 PEASE LLP
 52 East Gay Street
 Columbus, Ohio 43215
 Telephone (614) 464-6400
 Fax (614) 719-4796
 kjrubin@vorys.com
 tbmcgranor@vorys.com
 kmmundy@vorys.com

Thomas N. McCormick (*pro hac vice*)
 VORYS, SATER, SEYMOUR AND
 PEASE LLP
 4675 MacArthur Court, Suite 700
 Newport Beach, California 92660
 Phone (949) 526-7903 | Fax (949) 383-2384
 tnmccormick@vorys.com

Executive Committee Members

s/ Neely B. Agin
 Neely B. Agin
 WINSTON & STRAWN LLP
 1901 L Street, N.W.
 Washington, DC 20036
 Telephone (202) 282-5000
 nagin@winston.com

Neha Vyas
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, NY 10166
 Telephone (212) 294-6700
 nvyas@winston.com

Attorneys for Activision Blizzard, Inc.

MONTGOMERY McCRACKEN
 WALKER
 & RHOADS LLP
 1735 Market Street, 21st Floor
 Philadelphia, PA 19103
 Telephone (215) 772-1500
 ccasper@mmwr.com

Blake Marks-Dias, WSBA No. 28169
 Eric A. Lindberg, WSBA No. 43593
 CORR CRONIN LLP
 1015 Second Avenue, Floor 10
 Seattle, WA 98104
 (206) 625-8600 Phone
 (206) 625-0900 Fax
 bmarksdias@corrchronin.com
 elindberg@corrchronin.com

Attorneys for Defendant Valve Corporation

s/ Neely B. Agin
 Neely B. Agin
 WINSTON & STRAWN LLP
 1901 L Street, N.W.
 Washington, DC 20036
 Telephone (202) 282-5000
 nagin@winston.com

Neha Vyas
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, NY 10166
 Telephone (212) 294-6700
 nvyas@winston.com

Attorneys for Proletariat Inc.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 IT IS FURTHER ORDERED that pursuant to Fed. R. Evid. 502(d), the production of
3 any documents in this proceeding shall not, for the purposes of this proceeding or any other
4 federal or state proceeding, constitute a waiver by the producing party or non-party of any
5 privilege applicable to those documents, including the attorney-client privilege, attorney work-
6 product protection, or any other privilege or protection recognized by law.
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8 DATED this 9th day of November 2023.

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12 John C. Coughenour
13 UNITED STATES DISTRICT JUDGE
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